

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America
v.

Anyah Acres

Defendant(s)

)
)
) Case No. 23-mj-1635
)
)
)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 12, 2023 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. 111(a),(b); 1114

Offense Description

Assaulting, resisting, or impeding a federal officer

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

/s/ Robert Edwards

Complainant's signature

Robert Edwards, Special Agent, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/12/2023

/s/ Carol Sandra Moore Wells

Judge's signature

City and state: Philadelphia, Pennsylvania

Hon. Carol Sandra Moore Wells, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN THE MATTER OF THE APPLICATION
OF THE UNITED STATES FOR A
COMPLAINT AND WARRANT**

MAGISTRATE NO. 23-1635

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Robert Edwards, being duly sworn, depose and state that:

INTRODUCTION

1. I am a Special Agent with Homeland Security Investigations (“HSI”), assigned to the Border Enforcement Security Taskforce in Philadelphia, Pennsylvania. I have been employed with HSI since 2015. Prior to this position, your affiant was employed with the United States Border Patrol for eight years. As a part of my official duties, I investigate criminal violations of the federal narcotics, immigration, and firearms laws.

AFFIDAVIT

2. This affidavit is made in support of a criminal complaint against, and arrest warrant for, Anyah ACRES where there is probable cause to believe that, in Philadelphia County within the Eastern District of Pennsylvania, ACRES committed the federal crime of Assault on a Federal Agent, in violation of 18 U.S.C. § 111(a)(1),(b) and 18 U.S.C. § 1114.

3. Title 18 U.S.C. § 111(a) makes it a Federal crime to forcibly assault, resist, oppose, impede, intimidate, or interfere with any person designated in 18 U.S.C. § 1114 while engaged in or on account of the performance of official duties.

4. Title 18 U.S.C. § 1114 designates any officer or employee of the United States or of any agency in any branch of the United States Government (including any member of the

uniformed services) while such officer or employee is engaged in or on account of the performance of official duties, or any person assisting such an officer or employee in the performance of such duties.

5. The information contained in this affidavit is based upon my personal knowledge and observations, the observations and personal knowledge of other law enforcement officers, and information provided to law enforcement officers. Because this affidavit is submitted for the limited purpose of establishing probable cause, this affidavit does not set forth each and every fact known to me or other agents regarding this investigation.

PROBABLE CAUSE

6. On March 3, 2023, agents conducted a controlled delivery of machinegun conversion devices to 911 Longacres Blvd in Yeadon, PA. During the controlled delivery, agents encountered ACRES inside of the residence. ACRES explained that she was the girlfriend of Breyonne GIBSON (“GIBSON”) and lived at the residence with him. My partner and I conducted an interview of ACRES at the time.

7. On August 3, 2023, GIBSON was indicted by a Grand Jury in the Eastern District of Pennsylvania for violations of 18 U.S.C. § 922(o) (possession of a machinegun) and subsequently a federal arrest warrant was issued for GIBSON. On September 13, 2023, HSI agents tracked GIBSON’s location to 613 North Redfield Street (“the target residence”) in Philadelphia, PA. Agents set up surveillance around the location at approximately 11:00 a.m.

8. At approximately 3:20 p.m., agents observed ACRES exit the front door of the target residence, walk down the front stairs, and cross the street to a parked car. An HSI agent parked a short distance away observed ACRES look into his vehicle as she walked past. ACRES

then entered the driver seat of an orange Kia Forte. Agents observed ACRES drive the car down North Redfield Street, which is a one-way street, and stop in front of the target residence. Agents observed the front door of the target residence open and a black male, later identified as GIBSON, exit the house. He walked down the stairs and entered the passenger seat of the Kia Forte.

9. ACRES then quickly accelerated the car northbound toward Callowhill Street. Agents activated their emergency lights and drove south on Redfield Street towards ACRES. ACRES stopped the car a few feet from the lead law enforcement vehicle, which still had its lights activated. Agents also stood on either side of the lead law enforcement vehicle with “POLICE” displayed on their clothes and vests. ACRES then accelerated towards the law enforcement vehicle, striking the front bumper. The law enforcement vehicle was being driven by Department of Homeland Security Special Agent Christopher Chase. Special Agent Chase is a federal officer as defined by 18 U.S.C. § 1114.

10. ACRES then placed the vehicle into reverse and drove backwards down North Redfield Street towards law enforcement vehicles that were behind her with their emergency light activated. ACRES drove in reverse for approximately 40 feet before coming to a stop. Agents followed her southbound on Redfield Street. ACRES once again placed her car into drive, drove toward two federal agents wearing police clothing and identifying themselves as law enforcement, and again struck the front bumper of Special Agent Chase’s vehicle.

11. Undeterred, ACRES reversed approximately 10 to 15 feet before federal agents were able to stop her car. Agents opened the passenger door, removed GIBSON, and placed him under arrest. ACRES was then forcibly removed from the driver seat and placed in custody.

12. Based on the facts set forth above, I request an arrest warrant be issued for

ANYAH ACRES, charging her with assault on an employee or officer in the performance of official duties or any person assisting an employee or officer in the performance of such duties while using a deadly weapon, in violation of 18 U.S.C. § 111(a)(1),(b) and 18 U.S.C. § 1114.

/s/ Robert Edwards
Robert Edwards
Special Agent
Homeland Security Investigations

SUBSCRIBED TO AND SWORN TO BEFORE ME
THIS 12th DAY OF SEPTEMBER 2023

/s/ Carol Sandra Moore Wells
HONORABLE CAROL SANDRA MOORE WELLS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF PENNSYLVANIA